

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	19-CR-00940 JCH
	)	
BRANDON CHARLEY,	)	
	)	
Defendant.	)	

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**DEFENDANT’S NOTICE OF INTENT TO OFFER EXPERT TESTIMONY**

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Defendant Brandon Charley, by and through his counsel of record, Jason Bowles of the Bowles Law Firm and Robert Gorence of Gorence & Oliveros, P.C., and pursuant to Fed. R. Crim. P. 16(c) and the *Joint Proposed Scheduling Order* (Doc. 87), the Defendant Brandon Charley gives notice that he intends to introduce expert testimony during trial, as described in the attached report. Defendant submits that this testimony is admissible evidence under Fed. R. Evid. 702 and 703, and that the witness has a reliable basis in knowledge and experience in her professional disciplines. Defendant submits the following:

1. Joost Janssen  
5045 Glen View Pl.  
Bonita, CA, 91902  
Email: [joostj@live.com](mailto:joostj@live.com)

Mr. Janssen’s qualifications and background, as well as his review and opinions in this case are contained in the attached report. He is expected to testify as outlined in the report, and more specifically as outlined in his points and conclusions.

2. Any experts listed and disclosed by the Government.
3. Any rebuttal witnesses.

Respectfully submitted,

/s/ Jason Bowles

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and

/s/ Robert Gorence

Robert Gorence  
Gorence & Oliveros, P.C.  
300 Central Avenue SW, Suite 1000E  
Albuquerque, NM 87102  
Telephone: (505) 244-0214

I hereby certify that a true and correct copy  
of the foregoing was electronically submitted  
this 28<sup>th</sup> day of October, 2019 to:

Joseph Spindle  
Assistant United States Attorney

/s/ Jason Bowles

Jason Bowles  
Bowles Law Firm